



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10**

1200 Sixth Avenue, Suite 900
Seattle, Washington 98101-3140

October 27, 2008

Reply To: EPTA - 088

Ref: 03-062-DOD

Ms. Kimberly Kler
EIS/OEIS Project Manager
Naval Facilities Engineering Command Northwest
1101 Tautog Circle, Suite 203
Silverdale, WA 98315-1101

Dear Ms. Kler:

The U.S. Environmental Protection Agency (EPA) has reviewed the Draft Environmental Impact Statement (EIS) for the proposed **Naval Sea Systems Command (NAVSEA), Naval Undersea Warfare Center (NUWC), and Keyport Complex Extension (CEQ no. 20080346)** in Gray Harbor, Jefferson, Kitsap and Mason Counties, WA. Our review was conducted in accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act. Section 309 directs EPA to review and comment in writing on the environmental impacts associated with all major federal actions. Under our policies and procedures, we evaluate the document's adequacy in meeting NEPA requirements.

The draft EIS evaluates the potential environmental impacts associated with current and proposed research, development, testing, and evaluation (RDT&E) activities scheduled and coordinated by Naval Undersea Warfare Center (NUWC) Keyport at the Naval Sea Systems Command (NAVSEA) NUWC Keyport Range Complex in WA. The proposed action includes an extension of the operational areas and an increase in the average annual number of tests and days of testing at three range sites that comprise the Range Complex. The three range sites include two in Puget Sound (Keyport and Dabob Bay Range Complex (DBRC)) and one off the west coast of the Olympic Peninsula (Quinault Underwater Tracking (QUTR)). The Navy developed and analyzed independent sets of alternatives for each range site. In addition to the No Action Alternative, they include one alternative at the Keyport range site, two at DBRC, and three at QUTR. A Preferred Alternative was also identified for each range site.

EPA is concerned about potential adverse impacts of an expanded QUTR range on protected resources in the Olympic Coast National Marine Sanctuary. The proposed expansion would be 38 times larger than the existing range area and the preferred alternative would include a surf zone landing area inside the sanctuary. Proposed activities in this area may disturb benthic habitat and biota, but the DEIS does not give enough information to evaluate the extent or magnitude of this disturbance. We recommend that the final EIS include more information about the anticipated disturbance to benthic organisms and how impacts will be avoided and mitigated. We also recommend consideration of an alternative smaller in area with a surf zone landing area outside the sanctuary.

EPA is also concerned about potential adverse impacts to water quality and critical habitat in Puget Sound, particularly near the mouths of the Duckabush and Hamma Hamma Rivers. The proposed boundaries of the DBRC range extend southwest into Hood Canal close to shore in these sensitive areas. As an active member of the Puget Sound Partnership, EPA strongly supports the strategic priorities that have been established to protect and restore this important resource. Ecosystem processes in sensitive areas are key areas to protect and restore. We recommend consideration of an alternative that avoids more of the critical habitat areas, particularly near the mouths of the Duckabush and Hamma Hamma Rivers.

Based on our review, we have assigned an EC-2 (Environmental Concerns, insufficient information) rating to the draft EIS. This rating and a summary of our comments will be published in the *Federal Register*. For your reference, a copy of our rating system used in conducting our review is enclosed.

If you have questions or would like to discuss these comments, please contact me at (206) 553-1601. Thank you for the opportunity to provide these comments.

Sincerely,

/s/

Christine B. Reichgott, Manager
NEPA Review Unit

Enclosures